

***NATIONAL CAMPAIGN FOR
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May 23, 2003

Richard Matthews, Program Manager
National Organic Program,
USDA-AMS-TMP-NOP
1400 Independence Ave, S.W.
Room 4008 – So., Ag. Stop 0268
Washington, D.C., 20250

RE: Docket Number TMD-03-02
FR 27941, V.68, No. 99, Thursday, May 22, 2003
**National Organic Program; Proposed Amendments to the
National List of Allowed and Prohibited Substances**

Dear Mr. Matthews:

The National Campaign for Sustainable Agriculture Organic Committee requests an extension to the deadline for comments to this Proposed Rule amending Section 205.605 of the National List.

This request is for an extension to June 23, 2003 – a reasonable 30-day comment period. A 10-day comment period, especially over a holiday weekend, provides too short a time for the preparation of substantive comments: in fact it is really only 6 working days.

In addition, as of mid-day on Friday, May 23, 2003, this Federal Register Notice had yet to be added to the “Today’s News” or “Newsroom” sections of the NOP website, making it even harder for citizens to know that this Docket has been posted and the comment period has begun.

This 10-day public comment period allows little opportunity for those without computers and internet access to become aware of the Docket, much less compile detailed comments. It must not be forgotten that there is a large segment of the population that does not have daily access to the internet. A recent Organic Farming Research Foundation survey with 1000 organic farmer respondents, found that 22% of those responding had no internet access whatsoever.

By using the internet as the *sole* method of informing the public, rural and under-resourced populations have been left out of the process altogether. Where groups such as the National Campaign for Sustainable Agriculture attempt to mitigate that with public outreach to some of the organizations serving these populations, the 10-day comment period prevents any such attempt – there is simply not enough time.

Finally, The National Campaign for Sustainable Agriculture Organic Committee requests that

the National Organic Program institute a policy of 30-day absolute minimum for all public comment periods (including Federal Register notices as well as other policy proposals).

Thank you,

Liana Hoodes for the *National Campaign for Sustainable Agriculture Organic Committee*
Co-Chairs:

Michael Sligh, *Rural Advancement Foundation International*

Elizabeth Henderson, *Peacework Organic Farm, Northeast Organic Farming Assoc.NY*

Cc: Senator Tom Harkin
Senator Patrick Leahy
Congressman Jim Walsh
Congressman Peter DeFazio
Congressman Sam Farr